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Jane Doe 2*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SAGE HUMPHRIES, GINA MENICHINO,  
ROSEMARIE DeANGELO, DANIELLE  
GUTIERREZ, JANE DOE 1,  
and JANE DOE 2

Plaintiffs,

vs.

MITCHELL TAYLOR BUTTON and  
DUSTY BUTTON,

Defendants.

Case Number: 2:21-cv-01412-ART-EJY

**DECLARATION OF DANIELLE  
GUTIERREZ IN SUPPORT  
OF PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT**

1 I, Danielle Gutierrez, declare as follows:

2 1. I am Danielle Gutierrez, a Plaintiff in the above-captioned action.

3 2. Defendants have filed a defamation counterclaim against me for the following  
4 statements, which were published in Cosmopolitan:

5 First, he was her teacher who told her she was like his ‘little sister.’

6 Their [Taylor and Danielle’s] relationship affected everything: her mental health,  
7 her sense of safety. Even where she went to college – he convinced her to stay  
8 local. And because he didn’t want her partnering with other men in classes there,  
9 she paused on studying dance. He yelled, berated her in public. If someone  
10 attempted to intervene, he scared them off by becoming belligerent. She started  
believing no one could help her. In the worst moments, she was afraid for her  
life.

11 3. These statements are true.

12 4. I subjectively believe these statements are true.

13 5. To the best of my knowledge and belief, I did not provide any information to  
14 Cosmopolitan beyond information that was already accessible in my complaint against  
15 Defendants.

16 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
17 knowledge and belief.

18 Dated: January 6, 2025

19 /s/ Danielle Gutierrez  
20 Danielle Gutierrez  
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